

**Saucedo, Luis E (CRT)**

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**From:** Lara Morell [laramorell@gmail.com]  
**Sent:** Tuesday, February 16, 2016 4:15 PM  
**To:** Saucedo, Luis E (CRT)  
**Cc:** TCA PR; Federico Hernandez Denton; Alfredo Castellanos; Antonio R. Bazan; Buehler, Brian (CRT); Garcia, Lynda (CRT); Wayne, Seth (CRT); Beatriz Annexy Guevara  
**Subject:** Re: Proposal for Joint Stipulation Supplementing Directives

Luis,

We understand that the Parties believe that further restrictions are needed and therefore, have worked hard on the proposed Stipulation, due originally on February 1, 2016. Be advised that, even if our initial assessment is toward sufficiency of the December 10th Directives, it doesn't mean that we believe the proposed Stipulation is without merit. If afforded the necessary time for in depth analysis of the document, I'm sure that we can come to a consensus on Supplemental Directives. Be assured that we would not be asking for time, if we were not interested in discussing the matter further, with an open mind and in a responsible manner, in order to achieve said consensus.

Respectfully,

Lara

On Tue, Feb 16, 2016 at 4:22 PM, Saucedo, Luis E (CRT) <[Luis.E.Saucedo@usdoj.gov](mailto:Luis.E.Saucedo@usdoj.gov)> wrote:

Lara,

Thank you for your message. Would you please clarify who you mean by the TCA's legal counsel. It would be helpful to know who is included in the TCA's position, since you indicate that the TCA still needs to consult with the constitutional lawyers. I assume you are referring to yourself, but would like to confirm. Also, to be clear, please confirm that the TCA believes that no additional measures are necessary to supplement the December 10 directives. As you know, the Court invited the Parties to consider whether additional measures were necessary in its December 10 order. We want to make sure that further discussions on these issues will be fruitful.

Thank you,

Luis

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**From:** Lara Morell [mailto:[laramorell@gmail.com](mailto:laramorell@gmail.com)]  
**Sent:** Tuesday, February 16, 2016 2:49 PM  
**To:** Saucedo, Luis E (CRT)  
**Cc:** TCA PR; Federico Hernandez Denton; Alfredo Castellanos; Antonio R. Bazan; Buehler, Brian (CRT); Garcia, Lynda (CRT); Wayne, Seth (CRT); Beatriz Annexy Guevara  
**Subject:** Re: Proposal for Joint Stipulation Supplementing Directives

Luis,

Thank you for your prompt response. We join in and appreciate the effort in making this task a joint and collaborative effort. Nonetheless, it is the TCA's position and that of his legal counsel that the Order given by the Court, on December 10, 2015, is clear and specific enough, along with the working protocols already implemented regarding complaints, agreed to on September 25, 2015. Again, we will gladly work with the Parties in any proposals you deem fit.

On the other hand, as mentioned before, CL's won't be available before the Core Team's visit week. The 26th is the earliest everyone will be available, due also to the work scheduled for that week.

Respectfully,

Lara

Arnaldo and Lara,

Thank you for your response and for carefully reviewing the stipulation. Having reviewed the stipulation, please let us know if you have questions or concerns that we can address before February 26, when the parties and the TCA typically hold their 253 meeting. I will need to consult with the Commonwealth regarding the timing of the stipulation and a request for extension. It is our intention as Plaintiff in the case to work collaboratively with the TCA and the Commonwealth in the areas specified by the Court in its December 10 order. As you know, the Court instructed the Parties and the TCA to address the notification processes related to civilian complaints and the TCA's involvement with the community. If the parties are in a position to jointly request an extension of the February 16 deadline with respect to areas specified by the Court, is the TCA willing to join in that request?

Thank you and have a great weekend.

Luis

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**From:** Lara Morell [mailto:[laramorell@gmail.com](mailto:laramorell@gmail.com)]  
**Sent:** Friday, February 12, 2016 4:31 PM  
**To:** Saucedo, Luis E (CRT); Beatriz Annexy Guevara  
**Cc:** TCA PR; Federico Hernandez Denton; Alfredo Castellanos; Antonio R. Bazan  
**Subject:** Proposal for Joint Stipulation Supplementing Directives

Mr. Saucedo,

Good afternoon and thank you for your message. We have carefully reviewed the proposed "Joint Stipulation Supplementing Directives." At this time, we have various questions, comments, and/or suggestions regarding several paragraphs of the proposed "Stipulation." The TCA, the CL's, and myself, need more time to meet and discuss the full extent of each paragraph in a responsible manner. Due to the CL's previous work engagements and the complexity of the issues involved, we will be ready to discuss by the end of the Core Team's visit, February 26, 2016. We appreciate the opportunity to provide input and suggestions.

Please advise as to the timeframe and extension of time.

Respectfully,

Lara A. Morell

Lic. Lara A. Morell Maldonado

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